

1 ROB BONTA  
Attorney General of California  
2 MICHAEL L. NEWMAN  
Senior Assistant Attorney General  
3 VILMA PALMA-SOLANA  
Supervising Deputy Attorney General  
4 JESSE BASBAUM (SBN 273333)  
ALEX FLORES  
5 ANNABELLE WILMOTT  
Deputy Attorneys General  
6 1515 Clay Street, 21st Floor  
Oakland, CA 94612-1499  
7 Telephone: (510) 879-0280  
Fax: (510) 622-2270  
8 E-mail: [Jesse.Basbaum@doj.ca.gov](mailto:Jesse.Basbaum@doj.ca.gov)  
*Attorneys for the State of California*

9  
10 *[Additional Counsel Listed on Signature Page]*

11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14  
15 NATIONAL TPS ALLIANCE, et al.,  
16 Plaintiffs,  
17 v.  
18 KRISTI NOEM, in her official capacity as  
19 Secretary of Homeland Security, et al.,  
20 Defendants.

Case No. 3:25-cv-1766-EMC

**UNOPPOSED REQUEST FOR THE  
COURT TO CONSIDER BRIEF OF  
AMICI CURIAE IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

1 The States of California and New York, on behalf of the Amici States,<sup>1</sup> respectfully request  
 2 that the Court consider the Brief of Amici Curiae—attached hereto as Exhibit 1 and previously  
 3 filed at ECF No. 62—in support of plaintiffs’ motion for partial summary judgment [ECF No.  
 4 165]. Plaintiffs and Defendants have indicated they do not oppose this request.

5 On March 7, 2025, the Court granted the Amici States leave to file a brief in support of  
 6 Plaintiffs’ Motion to Postpone. ECF Nos. 62, 65. The Brief of Amici Curiae explained why  
 7 postponement was in the public interest given the potential impacts to families, the workforce and  
 8 economy, public health, and public safety. The Court later granted the Motion to Postpone. ECF  
 9 No. 93.

10 The parties have now filed cross-motions for summary judgment in which they dispute,  
 11 among other things, the extent and relevance of reliance interests. *See* ECF No. 165 at pp. 15-16;  
 12 ECF No. 199 at p. 14. In connection with those motions, the Amici States refer the Court to the  
 13 previously filed Brief of Amici Curiae. The brief illustrates, among other things, the extensive  
 14 reliance interests of Venezuelan TPS holders and of the Amici States. In granting the plaintiffs’  
 15 Motion to Postpone, the Court recognized that “[w]here a TPS extension is given, it creates  
 16 important reliance interests.” ECF 93 at p. 52; *see also Dep’t of Homeland Sec. v. Regents of the*  
 17 *Univ. of California*, 591 U.S. 1, 30-34 (2020).

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 <sup>1</sup> The Amici States include: California and New York, together with Connecticut,  
 27 Delaware, Hawaii, Illinois, Maine, Maryland, Michigan, Minnesota, Nevada, New Jersey,  
 28 Oregon, Rhode Island, Vermont, Washington, the District Of Columbia, and the Commonwealth  
 of Massachusetts. The District of Columbia and the Commonwealth of Massachusetts have been  
 included as “Amici States” for purposes of this litigation.

1 Dated: June 27, 2025

Respectfully submitted,

2 ROB BONTA  
3 *Attorney General*  
4 *State of California*  
5 Michael L. Newman  
6 *Senior Assistant Attorney General*  
7 Vilma Palma-Solana  
8 *Supervising Deputy Attorney General*  
9 Alex Flores  
10 Annabelle Wilmott  
11 *Deputy Attorneys General*

12 /s/ Jesse Basbaum  
13 Jesse Basbaum  
14 *Deputy Attorney General*

15 LETITIA JAMES  
16 *Attorney General*  
17 *State of New York*  
18 Barbara D. Underwood\*  
19 *Solicitor General*  
20 Judith N. Vale\*  
21 *Deputy Solicitor General*  
22 Zoe Levine\*  
23 *Special Counsel for Immigrant Justice*

24 /s/ Cleland B. Welton II  
25 Cleland B. Welton II (pro hac vice)  
26 *Assistant Solicitor General*

27 \* Not admitted in the Northern District of  
28 California

**ATTORNEY ATTESTATION**

I, Jesse Basbaum, am the ECF user whose ID and password are being used to file this Unopposed Request for the Court to Consider Brief of Amici Curiae in Support of Plaintiffs' Motion for Partial Summary Judgment. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that I have the authority to file this document and its related exhibits and attachments on behalf of each of the signatories.

/s/ Jesse Basbaum  
JESSE BASBAUM

**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2025, I caused the above document and its attachments to be electronically filed with the Clerk of Court using CM/ECF, which will send electronic notification of such filing to all registered counsel.

/s/ Jesse Basbaum  
JESSE BASBAUM